

# EXHIBIT I

**EXHIBIT 70  
UNREDACTED VERSION  
OF DOCUMENT SOUGHT  
TO BE SEALED**

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3

4 CISCO SYSTEMS, INC.,

5 Plaintiff,

6 vs.

Civil Action No.

7 ARISTA NETWORKS, INC.,

5:14-cv-5344-BLF

8 Defendant.  
9  
10

11 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

12 SUBJECT TO PROTECTIVE ORDER  
13

14 VIDEOTAPED DEPOSITION OF HUGH HOLBROOK,

15 VOLUME I  
16

17 February 19, 2016

18 10:06 a.m. - 6:39 p.m.  
19

20 555 Twin Dolphin Drive, 5th Floor

21 Redwood Shores, California  
22

23 REPORTED BY:

24 James Beasley

25 CSR No. 12807, CCR No. 835, RPR

1 Q. Uh-huh.

2 A. I think there are places in the IETF where  
3 they require that certain things be configureable,  
4 but the IETF does not mandate syntax, to my  
5 knowledge.

6 Q. So to your knowledge, the RFCs that you  
7 co-authored and submitted to the IETF do not require  
8 any particular CLI commands be used, correct?

9 A. No.

10 Q. I'm sorry, that's -- it's correct that  
11 they do not require --

12 A. No, they do not.

13 Q. Okay. Do any of the RFCs that you  
14 co-authored mandate any particular type of user  
15 interface be used?

16 A. I think that some of the -- some of the  
17 RFCs may mandate that some parameters are  
18 configurable, but I don't think that there's an  
19 indication of how.

20 Q. So the RFCs that you co-authored do not  
21 require a particular type of user interface be used,  
22 correct?

23 A. Not that I'm aware of.

24 Q. So it would be possible for a network  
25 equipment company to comply with the SSM RFC by

1 using a graphical user interface, correct?

2 A. Yeah. As I said before, almost anything  
3 can be done in the realm of computer science with  
4 enough code. I'm not sure it would be a very  
5 successful product, but I think one could build it.

6 Q. And it would be possible for a network  
7 equipment company to comply with the Sparse Mode PIM  
8 RFC by using a graphical user interface, correct?

9 A. Yes. Again, I -- I'm not sure it would be  
10 a very successful product in the market space that  
11 we're in, but I think one could have a graphical  
12 user interface.

13 Q. Sitting here today, are you aware of any  
14 industry standard that has actually been ratified by  
15 an industry standard setting organization that  
16 requires a use of a particular set of CLI commands?

17 A. I'm not aware of any.

18 Q. Are you aware of any industry standard  
19 that has actually been ratified by an industry  
20 standard setting organization that requires a  
21 particular type of user interface?

22 A. I'm not aware of any standards body that  
23 has -- you know, that governs particular user  
24 interfaces. The -- well, the IETF does govern like  
25 SNMP and standardizes SNMP implementations and MDS.

1 Q. You're not aware of any industry standards  
2 that requires the use of a graphical user interface  
3 versus a command-line interface, for example, to  
4 comply with any industry standards set by a  
5 standards setting organization, correct?

6 A. Sorry, you keep using "industry standard."  
7 Like are you differentiating that from standard in  
8 some way? I mean...

9 Q. I'm just trying to be very clear, that's  
10 all.

11 A. Okay. I find it confusing.

12 Q. Sorry.

13 A. Sorry, can you ask your question again.

14 Q. Are you aware of any industry standards  
15 that require the use of a graphical user interface  
16 as opposed to a command-line interface to comply  
17 with a standard set by a standard setting  
18 organization?

19 MR. SILBERT: Objection. Vague.

20 THE WITNESS: Well, let me answer that how  
21 I understood it. I am not aware of any standards  
22 that require a command-line interface or a graphical  
23 user interface.

24 That have been published by standards  
25 bodies, to be -- to be precise.